

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

LA UNIÓN DEL PUEBLO ENTERO, et al., <i>Plaintiffs,</i>  v.  GREGORY W. ABBOTT, et al., <i>Defendants.</i>	5:21-cv-0844-XR
OCA-GREATER HOUSTON, et al., <i>Plaintiffs,</i>  v.  TEXAS SECRETARY OF STATE JOHN SCOTT, et al., <i>Defendants.</i>	1:21-cv-0780-XR
HOUSTON AREA URBAN LEAGUE, et al., <i>Plaintiffs,</i>  v.  GREGORY WAYNE ABBOTT, et al., <i>Defendants.</i>	5:21-cv-0848-XR
LULAC TEXAS, et al., <i>Plaintiffs,</i>  v.  JOHN SCOTT, et al., <i>Defendants.</i>	1:21-cv-0786-XR
MI FAMILIA VOTA, et al., <i>Plaintiffs,</i>  v.  GREG ABBOTT, et al., <i>Defendants.</i>	5:21-cv-0920-XR

UNITED STATES OF AMERICA,  
*Plaintiff,*

v.

STATE OF TEXAS, et al.,  
*Defendants.*

5:21-cv-1085-XR

**PLAINTIFFS' EXPERT DESIGNATION**

Plaintiffs Houston Area Urban League, Delta Sigma Theta Sorority, Inc., The Arc of Texas, Jeffrey Lamar Clemons, OCA-Greater Houston, League of Women Voters of Texas, REVUP-Texas, Texas Organizing Project, Workers Defense Action Fund, La Unión del Pueblo Entero, Southwest Voter Registration Education Project, Mexican American Bar Association of Texas, Texas Hispanics Organized for Political Education, Jolt Action, William C. Velasquez Institute, and Fiel Houston, Inc. (collectively, "Plaintiffs") by and through the undersigned counsel, hereby submit their Initial Expert Designation pursuant to Federal Rule of Civil Procedure 26(a)(2) and the Court's Scheduling Order (Dkt. No. 125), as amended by the Stipulated Extension of Expert Discovery Deadline (Dkt. No. 209).

Plaintiffs designate the following expert witness:

**Douglas L. Kruse, Ph.D.**  
Distinguished Professor  
Rutgers School of Management and Labor Relations, Co-Director  
Program for Disability Research  
94 Rockafeller Road  
New Brunswick, N.J. 08903

Dr. Kruse will testify regarding the matters and opinions contained in his expert report, including amendments and supplements, if any. Dr. Kruse was retained by Plaintiffs to provide expert testimony and may be contacted through undersigned counsel.

Discovery is ongoing in this matter and Plaintiffs hereby reserve the right to designate one or more additional expert witnesses for the purpose of addressing, responding to, and/or rebutting

Defendants' claims, and/or to address information obtained during discovery.

Further, Plaintiffs reserve the right to supplement and/or amend these designations in compliance with the Federal Rules of Civil Procedure, Court Order, and/or agreement between the parties.

Plaintiffs reserve the right to designate additional experts as allowed by Court Order, the Federal Rules of Civil Procedure, and/or any agreement between the parties. Plaintiffs reserve the right to de-designate any experts and/or to classify them as consulting experts in accordance with the Federal Rules of Civil Procedure and governing case law.

Respectfully submitted February 28, 2022

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 28, 2022, a true and correct copy of the foregoing document was filed via the CM/ECF system and all counsel of record were served electronically.

*/s/ Kenneth E.Broughton*  
Kenneth E.Broughton